

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

FORT GIBSON STATE BANK,

Plaintiff,

vs.

TRAVELERS CASUALTY AND SURETY  
COMPANY OF AMERICA, and SUSAN  
CHAPMAN,

Defendants.

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Civil Action No. 19-CV-144-SPS

**MOTION FOR ADMISSION *PRO HAC VICE* OF MICHAEL KEELEY**

Defendant Travelers Casualty and Surety Company of America (“Travelers”), pursuant to Eastern District Rule LCvR83.2(f), respectfully moves this Court for an order admitting Michael Keeley of the law firm of Clark Hill Strasburger, Dallas, Texas, to this Court *pro hac vice*, for the purposes of representing Travelers in the above-styled matter. In support of this motion, Travelers states as follows:

1. Michael Keeley is a member in good standing of the Texas State Bar, Arkansas State Bar, State Bar of New Mexico and State Bar of New York, as well as the U.S. Supreme Court, U.S. District Courts for the Northern, Eastern, Southern, and Western Districts of Texas, the District of Colorado, the District of New Mexico, and the Fifth, Sixth, Tenth, and Eleventh U.S. Circuit Courts of Appeal. His Request for Admission *Pro Hac Vice* is attached hereto as Exhibit “1.”

2. Mr. Keeley is expected to participate in the preparation and trial of this matter for Travelers.
3. Gary C. Crapster, the attorney who signed this motion, has been duly admitted to practice in this honorable Court. Mr. Crapster has entered his appearance and will continue as counsel in this case pursuant to LCvR83.3(b).

WHEREFORE, Defendant Travelers Casualty and Surety Company of America, respectfully requests that this Court enter an order allowing the entry of appearance of Michael Keeley as counsel *pro hac vice* for said Defendant for all purposes in this action.

Respectfully submitted,

/s/ Gary C. Crapster

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**ATTORNEYS FOR DEFENDANT  
TRAVELERS CASUALTY AND SURETY  
COMPANY OF AMERICA**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2019 I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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